

# EXHIBIT B

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

ERIC SUBER and MARY LYNNE  
SUBER, on their own behalf and on behalf of all  
others similarly situated,

Plaintiffs,

v.

LIBERTY MUTUAL INSURANCE GROUP,  
INC., d/b/a Liberty Mutual Insurance; LIBERTY  
MUTUAL INSURANCE COMPANY; SAFECO  
INSURANCE COMPANY OF AMERICA; and  
LM GENERAL INSURANCE COMPANY,

Defendants.

Case No. 2:21-cv-4750-GAM

**DECLARATION OF DANIELLE PANOS IN SUPPORT OF THE NON-INSURING  
DEFENDANTS' MOTION TO DISMISS PLAINTIFFS' COMPLAINT**

Under 28 U.S.C. § 1746, I, Danielle Panos, state the following facts are true and correct to the best of my knowledge and belief.

1. My name is Danielle Panos, I am over the age of 18, and I am competent in all respects to make this declaration.
2. I am employed by Liberty Mutual Group Inc. ("LMG") as Litigation Paralegal. I have held this position or a substantially similar position since May 2015.
3. In this role, I am familiar with the records management and policies of LMG,<sup>1</sup> Liberty Mutual Insurance Company ("LMIC"), and Safeco Insurance Company of America ("SICA").

---

<sup>1</sup> I am unaware of a Liberty Mutual entity named "Liberty Mutual **Insurance** Group, Inc." For purposes of this declaration, I assume Plaintiffs intended to name "Liberty Mutual Group Inc." If this assumption is incorrect, I will submit a supplemental declaration.

4. I was provided a copy of the Complaint in the above-captioned case, and I oversaw the search of available records to determine which entity or entities issued policies to Plaintiffs.
5. LM General Insurance Company issued and underwrote Plaintiffs' Policy numbered AOS28814822840 that insured Plaintiffs' 2021 Porsche 718.
6. LMG did not issue or underwrite Plaintiffs' Policy numbered AOS28814822840 nor could I find any evidence that LMG issued or underwrote any other auto policy that insured Plaintiffs' 2021 Porsche 718.
7. LMIC did not issue or Plaintiffs' Policy numbered AOS28814822840 nor could I find any evidence that LMIC issued or underwrote any other auto policy that insured Plaintiffs' 2021 Porsche 718.
8. SICA did not issue or Plaintiffs' Policy numbered AOS28814822840 nor could I find any evidence that SICA issued or underwrote any other auto policy that insured Plaintiffs' 2021 Porsche 718.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 10, 2022, in Boston, Massachusetts.

DocuSigned by:  
  
/s/ Danielle Panos  
Danielle Panos 4118F1D97CA421...